

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EscapeX IP LLC

Plaintiff,

v.

Civil Action No. 1:22-cv-03575-JMF

Block, Inc.

Defendant.

**DEFENDANT BLOCK, INC.’S NOTICE OF MOTION TO DISMISS FOR
FAILURE TO CLAIM PATENTABLE SUBJECT MATTER UNDER 35 U.S.C. § 101**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 12(b)(6) and upon the concurrently filed Memorandum of Law, Defendant Block, Inc. respectfully moves this Court for an Order dismissing with prejudice the Complaint (Dkt. 1) of Plaintiff EscapeX IP LLC, on the grounds that all claims of the patent-in-suit are invalid for claiming patent-ineligible subject matter under 35 U.S.C. § 101, and for such other and further relief as the Court deems just, necessary, and proper.

Block respectfully requests that the Court hold oral argument on this Motion.

Dated: August 5, 2022

Respectfully submitted,
/s/ Daniel S. Block

Daniel S. Block
Chandrika Vira
William H. Milliken
Sterne, Kessler, Goldstein & Fox, P.L.L.C.
1100 New York Avenue, N.W.
Washington, DC 20005
(202) 371-2600
dblock@sternekessler.com
cvira@sternekessler.com
wmilliken@sternekessler.com

Counsel for Defendant Block, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on August 5, 2022.

/s/ *Daniel S. Block*
Daniel S. Block